

## REMARKS/ARGUMENTS

The arguments and amendments presented herein include the arguments and amendments Applicants discussed with the Examiner during a phone interview on April 11<sup>th</sup>. Applicants submit that the arguments and amendments presented herein make the substance of the phone interview of record to comply with 37 CFR 1.133. If the Examiner believes that further information on the interview needs to be made of record to comply with the requirements, Applicants request the Examiner to identify such further information.

1. Amended Claims 1 and 15 Comply with the Enablement Requirements

The Examiner rejected claims 1 and 15 as not satisfying the enablement requirement of 35 U.S.C. §112, par. 1 on the grounds the language that “the mapping is used to map and convert files from the host file system to the local file system to support remote editing” is not supported by the Specification. (Eighth Office Action, pg. 2) Applicants traverse.

Applicants traverse this rejection and submit that submit that the claim language at issue is disclosed in the Specification on at least pg. 12, lines 25-29, which discloses “a mapping between a file within the host directory path on the host file system and a file on the local file system.” The Specification further discloses that the mapping is used to “to support remote editing of files in the host file system from the local file system”. See, Specification, pg. 12, lines 17-20 (“The present invention provides for such access and use of host files on the workstation 12 by providing a data structure for configuring a connection such that files and directories may be mapped and converted from the host 18 to the workstation 12 to support a scenario such as the Remote Edit/Compile/Debug”). According to the Specification, “Remote Edit/Compile/Debug provides a workstation environment for performing the edit, compile, and debug tasks associated with host application development.” (Specification, pg. 3, lines 18-19, pg. 12, lines 10-14) Thus, the Specification discloses that the mapping is used to map and convert files from a host file system, e.g., the host 18, to the local file system, e.g., the workstation 12, to support remote editing.

Accordingly, Applicants submit that the claim requirements at issue are supported by the disclosure of the Specification.

2. Amended claims 1 and 15 Comply with the Definiteness Requirement

The Examiner rejected claims 1 and 15 for failing to comply with the definiteness requirement (35 U.S.C. §112, par. 2) for failing to distinctly claim the method and system claims.

On April 11<sup>th</sup>, the attorney for Applicants and the Examiner held a phone interview discussing amendments to the claims to overcome this rejection. On April 19<sup>th</sup>, Applicants faxed the Examiner proposed amendments to the claims to overcome the definiteness rejection. The Examiner never returned Applicants phone calls requesting an interview to discuss the proposed amendments. Applicants submit the proposed amendments to overcome the definiteness rejection by reciting encoding the data structures. These added requirements to claim encoding the data structures are disclosed on at least pg. 7, lines 11-15, pg. 8, lines 3-6, pg. 18, lines 18-27 of the Specification.

The added requirement of using the file system connection descriptor to access the host file indicated in the mapping data structure as if it is the local file is disclosed on at least pg. 7, lines 17-24 and pg. 13, lines 1-17 of the Specification.

Further, the use of a manager as in claim 15 to generate the mappings is disclosed on pg. 12, lines 22-29 of the Specification

Applicants submit that these amendments clarify the claimed operations and overcome the definiteness rejection.

3. The Claims Comply with 35 U.S.C. §101

The Examiner rejected claims 1 and 15 for the reasons these claims were rejected under Section 112, par. 2. (Eighth Office Action, pg. 3)

Applicants submit that the claim amendments which overcome the Section 112, par. 2 rejection likewise overcome the Section 101 rejection, which was based on the Section 112 rejection.

Accordingly, Applicants request that the Examiner withdraw the Section 101 as well as Section 112 rejections.

2. Claims 1-30 are Patentable Over the Cited Art

The Examiner rejected claims 1-30 as obvious (35 U.S.C. §103) over Stedman (U.S. Patent No. 6,081,837), Imai (U.S. Patent No. 6,148,334), and Harvey (U.S. Patent No. 6,519,568). Applicants traverse.

Amended claims 1 and 15 concern providing information describing a file system connection between a local file system located on a local system and a host file system located on a host system, said method comprising: encoding a host system data structure comprising at least one tag representing the host file system; and encoding a mapping data structure comprising at least one tag representing a mapping between a file in the local file system and a file in the host file system and a transfer type that defines a data format for transferring data between the host system and the local system to support remote editing of files in the host file system from the local file system, wherein the tags are in a metalanguage format, and wherein each tag has an identifier and a set of one or more attributes and wherein the encoded local system data structure, host system data structure, and mapping data structure forms a file system connection descriptor; and using the file system connection descriptor to access the host file indicated in the mapping data structure.

The Examiner cited col. 19, lines 53-67 and col. 20, lines 1-25 of Stedman as teaching the claim requirement of encoding the information in a metalanguage format comprising one or more tags, each tag having an identifier and a set of one or more attributes. (Eighth Office Action, pgs. 3-4) Applicants traverse.

Stedman discusses a way to transfer information between a host and a client by having a host extension create a set of instructions that is transferred to the client computer. The client computer utilizes the set of instructions to create web pages displayed at the client computer. (Stedman, col. 2, lines 47-60)

The cited col. 19 mentions that a host extension creates an HTML document and inserts URLs within the document and tags that identify where the session ID is placed. Stedman defines the host extension as receiving information from a host computer and creating a set of instructions that is transferred via the server application framework to the client computer. The client computer utilizes these instructions to create Web pages. (Stedman, col. 2, lines 47-55) The cited col. 19 further mentions that the server application framework replaces session ID tags with the appropriate session ID.

The cited col. 19 discusses how a host extension creates an HTML document with tags for the session ID to send to the client system. Nowhere does this cited col. 19 of Stedman anywhere teach or suggest that the cited host extension encodes a local file system data structure, a host file system data structure, and a mapping data structure as tags in a metalanguage format that forms a file system connection descriptor as claimed. Moreover, nowhere does the cited col. 19 teach or suggest tags in a metalanguage format that represent the local file system, the host file system; and the mapping between the local file system and the host file system. Instead, the cited Stedman includes a set of instructions in a page that is substituted for actual data, not encoding information in tags comprising a descriptor on a local system data structure, host system data structure and mapping as claimed.

The Examiner cited col. 7, lines 3-20 and col. 24, lines 8-44 of Imai and col. 2, lines 55-63 of Stedman as teaching the details concerning the file system connection descriptor. (Eighth Office Action, pgs. 4-5) Applicants submit that these cited sections of Imai and Stedman do not teach or suggest the claim requirements of encoding a local file system data structure, a host file system data structure, and a mapping data structure between a file in the local file system and a file in the host file system and a transfer type that comprises tags in a metalanguage format that forms a file system connection descriptor.

The cited col. 7 of Imai mentions that a file requesting client includes a connection unit for setting up a connection with a file server and a file requesting unit to request the file. A file receiving unit receives the file and file storage unit stores the file. Nowhere does this cited col. 7 anywhere teach or suggest encoding tags in a metalanguage format representing a local file system, a host file system, and a mapping representing a mapping between files in the local file system and files in the host file system and a transfer type that defines a data format for transferring data between the host system and the local system. Instead, the cited col. 7 discusses client units to connect with a server, request a file, receive the requested file, display the file, etc. Although the cited col. 7 discusses how a file requesting client connects with a file server, there is no teaching or suggestion of tags in a metalanguage format for a local system data structure, a host system data structure, a mapping data structure, and a transfer type. Thus, the specific claimed local system data structure, host system data structure, and mapping data structure comprising tags in a metalanguage format forming a file system connection descriptor is not

taught or suggested to support remote editing of files in the host file system from the local file system as claimed.

The cited col. 24 of Imai mentions that a user program requests the transfer and display of file. A request handling unit handles the display request and the file request unit transmits the request. The file server program transfers the requested file to the requesting client. A multiple file transfer program may be used to transfer multiple files to the client. Although the cited col. 24 discusses operations to request and transfer one or more files, nowhere does the cited col. 24 anywhere teach or suggest the claim requirements of a local file system data structure, a host file system data structure, and a mapping data structure between files in the local file system and files in the host file system, and a transfer type comprising tags in a metalanguage format that forms a file system connection descriptor. Nowhere does the cited art disclose the claim requirement of transferring data between the host system and the local system to support remote editing of files in the host file system from the local file system. Instead, the cited col. 24 concerns a file request and transfer operations to transfer a requested file from a server to client.

The cited col. 2, lines 55-63 of Stedman mentions that the client is linked to the server over the Internet and the server is linked to the host over an SNA network. Nowhere in this cited col. 2 of Stedman is there any teaching or suggestion of the claim requirement that a local file system data structure, a host file system data structure, and a mapping data structure comprising tags in a metalanguage format forms a file system connection descriptor as claimed.

With respect to claims 3 and 16, the Examiner cited The Examiner cited col. 28, lines 38-65 of Imai as teaching the claim requirement, which is now in claims 1, 2, and 15, a of a transfer type data structure storing a transfer type that defines how data will be transferred between the host system and the local system for this mapping. (Eighth Office Action, pg. 6) Applicants traverse with respect to this limitation, which is now in claims 1, 2, and 15.

The cited col. 28 of Imai discusses a transfer condition for preventing a wasteful transfer of a file of a type which cannot be utilized at the file request client. If a type of the selected file satisfies the transfer condition, the multiple files are transferred. If the type of the selected file does not satisfy the transfer condition, then another file is selected.

Although the cited col. 28 discusses a condition indicating a file type to not transfer, the cited Imai does not teach or suggest the claim requirement of a transfer type data structure storing a transfer type that defines a data format for transferring data between the host system

and the local system for. Indicating file types not to transfer as in Imai is different from the claim requirement of a transfer type defining a data format of how data will be transferred between a host and local system for a mapping between file systems.

The Examiner cited col. 19, lines 21-27 of Harvey as teaching the claim requirement of supporting remote editing of files in the host file system from the local file system. (Eighth Office Action, pgs. 5-6) Applicants traverse.

The cited col. 19 of Harvey discusses a file converter that provides a mapping between different file formats. Although the cited col. 19 discusses converting files from one format to another, nowhere is there any teaching or suggestion of a transfer type that defines a data format for transferring data between the host system and the local system. Instead, the cited col. 19 discusses converting files between different file formats. Nowhere does this cited col. 19 teach or suggest a transfer type that defines a data format for transferring data between a host and local system. Moreover, nowhere does the cited col. 19 discuss the conversion to support remote editing of files in the host file system from the local file system. Thus, even if one were to modify the other references with Harvey to provide file conversion, this proposed modification still does not teach or suggest the claim requirement of a transfer type that defines a data format for transferring data between a host and local system to support remote editing of files in the host file system from the local file system.

In the Response to Arguments, the Examiner cited col. 8, lines 49-54 of Imai with respect to the file system connection descriptor requirement. (Eighth Office Action, pg. 10) Applicants traverse.

The cited col. 8 of Imai mentions that when the user selects a desired file from the menu a file list request for the selected file is sent to the file server. At the file server, the file list corresponding to the selected file is sent to the file requesting client. Nowhere does this cited col. 8 anywhere teach or suggest the claim requirements of a local file system data structure, a host file system data structure, and a mapping data structure between files in the local file system and files in the host file system, and a transfer type comprising tags in a metalanguage format that forms a file system connection descriptor.

In the Response, the Examiner further cited col. 27, lines 23-41 of Imai as teaching the mapping data structure (Eighth Office Action, pgs. 10-11), which recites a mapping data

structure comprising at least one tag representing a mapping between a file in the local file system and a file in the host file system.

The cited col. 27 mentions transferring only those files selected according to the file type to prevent waste due to the transfer of files that cannot be utilized at the file requesting client. In a third example, the multiple files transfer request unit is for transferring only those file which match the transfer condition provided in the file requesting client. Nowhere does this cited col. 27 anywhere teach or suggest a mapping data structure comprising at least one tag representing a mapping between a file in the local file system and a file in the host file system.

Applicants submit that claims 1 and 15 are patentable over the cited combination because the cited Stedman, Imai, and Harvey, alone or in combination, does not teach or suggest all the requirements of claims 1 and 15.

Amended claim 2 substantially includes the requirements of claims 1 and 15 in data structure format. Applicants amended claim 2 to add the requirement that each tag has an identifier and a set of one or more attributes and wherein the encoded local system data structure, host system data structure, and mapping data structure forms the file system connection descriptor, wherein the file system connection descriptor is used to access the host file indicated in the mapping data structure. These added limitations are found in claims 1 and 15.

Applicants submit that claim 2 is patentable over the cited for the reasons discussed above with respect to claims 1 and 15.

Claims 3-8, 9-14, and 16-30 are patentable over the cited art because they depend from one of claims 1, 2, and 15, respectively, which are patentable over the cited art for the reasons discussed above. The following dependent claims provide additional grounds of patentability over the cited art.

Amended claims 3, 9, and 16 depend from claims 2, 1, and 15, respectively, and further require that the mapping data structure comprises: a local file extension data structure storing a local file extension; and a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied.

The Examiner cited col. 22, lines 16-53 of Imai as teaching the claim requirement of a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied. (Eighth Office Action, pg. 6) Applicants traverse.

The cited col. 22 mentions that a user requests the transfer and the display of a file by issuing a request and uses the URL to identify the file. A request handling unit in the client handles the display, the file request unit transmits the file request, and the file server program transfers the file to the file requesting client. The client may receive a file list. The list includes files having identifiers requested by the user.

The cited col. 22 of Imai discusses handling of a file request between server and client. Nowhere does the cited col. 22 anywhere teach or suggest the claim requirement of a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied. Instead, the cited col. 22 discusses how a file or list of files matching a request is returned to the client.

Accordingly, claims 3, 9, and 16 provide additional grounds of patentability over the cited art.

The Examiner grouped claims 4, 22, and 29 in his rejection. (Office Action, pgs. 6-7) Applicants note that each of these claims recite very different limitations. Applicants note that claim 17 substantially includes the requirements of claim 4. The Examiner grouped claim 17 with claims 10 and 28 (Office Action, pg. 8). Claim 10 is substantially similar to claim 17, but claim 28 includes unrelated requirements.

Claims 4 and 17 depend from claims 1 and 15 and further require that the mapping data structure further comprises a host codepage data structure storing an identification of a host codepage in which data in the host file is encoded; and a local-codepage data structure storing an identification of a local codepage in which data in a local file is encoded.

The Examiner cited col. 27, lines 23-53 of Imai as teaching the additional requirements of claim 4. (Eighth Office Action, pgs. 6-7) Applicants traverse.

The cited col. 27 mentions transferring only those files selected according to the file type to prevent waste due to the transfer of files that cannot be utilized at the file requesting client. In a third example, the multiple files transfer request unit is for transferring only those file which match the transfer condition provided in the file requesting client. Nowhere does this cited col. 27 anywhere teach or suggest a mapping data structure further including a host codepage data structure storing an identification of a host codepage in which data in the host file is encoded and



a local-codepage data structure storing an identification of a local codepage in which data in a local file is encoded. Nowhere is there any mention or suggestion of host and local codepages as claimed.

Accordingly, claims 4 and 17 provide additional grounds of patentability over the cited art.

Claims 22, 25, and 28 depend from claims 1, 2, and 15 and additionally require a first transfer type indicates to transfer one file unmodified between the host file system and the local file system and wherein a second transfer type indicates to translate text in the file to transfer from the host file system to the local file system.

The Examiner cited col. 22, lines 37-54 of Harvey as teaching the additional requirements of these claims. (Eighth Office Action, pg. 8) Applicants traverse.

The cited col. 22 mentions a hierarchical interface hosting links to applications. An application is defined as a set of web pages and/or associated server and/or client side code that implements business line-specific navigation and/or behavior. The eHub has a user interface that allows adding a new data item or folder to the eHub catalog, specifying attributes and optionally access control, and transferring the data (e.g. files) from the publishing system from the eHub; modifying the attributes or access control of an existing catalog data item or folder; moving a data item or folder from one place in the hierarchy to another and removing a data item/folder from the catalog (removing a folder will implicitly remove all items under it). The eHub will provide through its user interface access to several user support features: documentation and site guides, on-line help, technical support gateways (e-mail, phone, etc.) and problem reporting.

Although the cited col. 22 discusses transferring files from a publishing system from the eHub, nowhere does the cited col. 22 anywhere teach or suggest that a first transfer type indicates to transfer one file unmodified between the host file system and the local file system and that a second transfer type indicates to translate text in the file to transfer from the host file system to the local file system. Nowhere does the cited Harvey teach or suggest that the transfer type is in a mapping data structure comprising at least one tag as claimed.

#### Conclusion

For all the above reasons, Applicant submits that the pending claims 1-30 are patentable over the art of record and in compliance with the definiteness and enablement requirements.

Applicants submit herewith a petition for a one month extension of time. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0460.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: May 29, 2007

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